



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
FSET Administrative and Provider Agencies
Child Care Coordinators
W-2 Agencies**

BWI OPERATIONS MEMO

No.: 99-21

File: 2433.5

Date: 03/19/99

Non W-2 [] W-2 [X] CC []

PRIORITY: High

**FROM: Stephen M. Dow
Program Implementation Team
Policy Analysis and Program Implementation Section**

SUBJECT: W-2 TIME LIMITS

CROSS REFERENCE: **W-2 Manual**
DES Administrator's Memo 99-04
W-2 Time Limits Educational Teleconference Network (ETN):
February 22, 1999
DXBM, March 10, 1999

EFFECTIVE DATE: The following policies are effective upon implementation in CARES. DXBMs will be issued as new CARES programming is moved into production.

PURPOSE

This Operations Memo communicates clarifications to the W-2 time limit policies and modifications to CARES programming as it relates to these policies.

BACKGROUND

These clarifications and modifications are due, in part, to recent W-2 time limit policy decisions as well as corrections and enhancements to CARES W-2 time limits programming.

The memo addresses these topics:

1. W-2 Time Limit Policy Clarifications and Related CARES Changes
 - a. 60-Month Limit for All Adults in W-2 Group
 - b. Caretaker of an Infant Clock
2. W-2 Time Limit Notices
3. CARES Data Clean-up

4. Existing CARES Programming Clarifications

- a. When A Clock Ticks
- b. Clocks Failing to Tick

TIME LIMIT POLICY CLARIFICATIONS AND RELATED CARES CHANGES

60-Month Lifetime Limit For All Adult W-2 Group Members

The 60-month clock must tick for all adults in the W-2 group (for a definition of the W-2 group, see the **W-2 Manual**, Appendix 1). In W-2 groups with more than 1 adult member, the adult member with the greatest number of months accumulated counts as the W-2 group's 60-month lifetime limit. This also applies when an adult joins a W-2 group. If an individual leaves the W-2 group, s/he takes with them the number of months accumulated prior to entering the group as well as the number of months accumulated while a part of the group. (**W-2 Manual** 2.3.1.1) [Wis. Stat. 49.145(2)(n)]

CARES: Currently, CARES only ticks the 60-month clock of the custodial parent participating in a W-2 employment position and the 60-month clock of the second parent in a two-parent family. The ticks for the second parent appear in the OPC field on AIWC. On CARES screen AQAM, these 2 individuals are marked as (EA) or eligible adults.

However, according to policy, the clock should tick for all adults in the W-2 group, not just the eligible adults. This includes all ineligible adults who are coded as included adults (or IA) in CARES such as stepparents. Therefore, CARES is being programmed to tick the clock for all eligible and included adults who are in the W-2 group. The ticks will appear on AIWC in the OPC field. The acronym for OPC has been changed to "Other Person Clock."

"Caretaker of an Infant" Clock

When a W-2 participant is the custodial parent of a child 12 weeks old or less and receives the Custodial Parent of an Infant (CMC) payment, the W-2 group is exempt from the 24-month time limit and 60-month time limit for participation in any one of the employment positions if the child is born less than 10 months after the date the individual was first determined to be eligible for AFDC or W-2 subsidized employment position.

If the child is born more than 10 months after the parent was first determined eligible for AFDC or a W-2 subsidized employment position, then both the 60-month and 24-month clocks must tick, unless the birth is a result of sexual assault or incest and it has been reported to a physician and law enforcement authorities. (**W-2 Manual**, Section 2.3.1.2) [Wis. Stat. 48.148(1m)(a) and (b)]

Two aspects of this policy have been clarified: First, the part of the policy that says, "*If the child is born more than 10 months after the parent was first determined eligible for AFDC or a W-2 subsidized employment position . . .*"; and, second, the part that says, "*. . . then both the 60-month and 24-month clocks must tick.*"

Policy Clarification #1: Early in the implementation of W-2, the language, "*if the child is born more than 10 months after the parent was first determined eligible for AFDC or a W-2 subsidized employment position. . .*" was interpreted to mean after the parent was first determined eligible in his or her lifetime. There was not a cutoff date for looking back when determining the first time for eligibility. Based on concerns from the W-2 agencies regarding the ability to track and verify this information, the Bureau of Welfare Initiatives (BWI) reviewed the statutory language and consulted with the Department's legal counsel. In the end, it was determined that it would be appropriate to interpret the language "*first determined eligible*" to mean "*first determined eligible as long as eligibility was determined on or after October 1, 1996.*" If eligibility for AFDC or a W-2 subsidized employment position were determined prior to October 1, 1996, a participant's clocks would not tick. The October date is based on the implementation of time limited benefits in Wisconsin.

Example 1: A woman who has never received AFDC or W-2 has a child, applies for W-2 and is found eligible for CMC. Neither of the clocks would tick because she had never been determined eligible for AFDC or W-2.

Example 2: A former AFDC recipient who has never participated in W-2 has a child, applies for W-2 and is found eligible for CMC. She was first determined eligible for AFDC in July 1997. Therefore, both the 60-month and appropriate 24-month clock would tick because she was determined eligible for AFDC after 10/1/96.

The second change to the CMC clock policy has to do with ticking the appropriate 24-month clock. More specifically, the policy says, *“If the child is born more than 10 months after the parent was first determined eligible for AFDC or a W-2 subsidized employment position then both the 60-month and 24-month clocks must tick.”* The statutes specifically identify either the Trial Job, CSJ or W-2 T 24-month clocks.

Policy Clarification #2: If a CMC participant was in a W-2 subsidized employment position immediately preceding (one day or less) placement in CMC, the 24-month clock of the subsidized employment position the participant was in would continue to tick. If the person was not in a W-2 subsidized employment position immediately preceding placement in CMC (2 days or more), a 24-month subsidized employment position clock would not tick, but the 60-month clock would continue to tick.

Example 1: A former AFDC recipient who has never participated in W-2 has a child, applies for and is found eligible for the CMC payment. Because the woman was not in a W-2 subsidized employment position immediately preceding placement in CMC, no 24-month clock is applicable and, therefore, only the 60-month clock will tick.

Example 2: A woman in a CSJ placement continuously since September 1, 1997 has a baby and is placed in the CMC payment placement. Because the woman was in a W-2 subsidized employment position immediately preceding placement in CMC, a 24-month clock is applicable and, therefore, both the CSJ 24-month clock and the lifetime 60-month clock will tick.

CARES: A new CMC clock field has been added to AIWC. Although a 24-month time limit is not associated with this CMC clock, entering ticks in this field will appropriately increment the 60-month clock.

NOTICES AND ALERTS

Alerts

Currently, alert 234 “W2 PLACEMENT CLOCK EXPIRES” is the only clock-related alert. There will be 3 additional alerts needed, which also requires a change in the alert text for 234. The appropriate alert will be generated on the 1st Friday after the W-2 clock (W-2C) cycle, which increments the appropriate clocks. W-2C is runs on the last business day of the calendar month, including Saturdays. These alerts will be altered or created:

1. 234 - W2 EMP(LOYMENT) POSITION CLOCK EXPIRES [CHANGE IN TEXT];
2. 270 - W2 EMP(LOYMENT) POSITION CLOCK/20 MONTHS;
3. 271 - W2 LIFETIME LIMIT CLOCK/56 MONTHS; AND
4. 272 - W2 LIFETIME LIMIT CLOCK EXPIRES.

CARES Notices

Five clock-related notices have been implemented.

1. AEEI: Clock Status information issued at W-2 six-month review.

The review notice (AEEI), generated at the confirmation of an open W-2 AG, will include new clock language. It will also display the amount of time used on each of the clock types located on screen AIWC for all adults in the W-2 group who have at least one month ticked.

2. The remaining 4 notices will be triggered on the first Friday after the W-2 clock cycle.

CM03	20-Month Clock Warning Notice - 24 Month Employment Position
CM04	23-Month Clock Warning Notice - 24 Month Employment Position
CM05	56-Month Clock Warning Notice - 60 Month Life Time Limit
CM06	59-Month Clock Warning Notice - 60 Month Life Time Limit

All of the clock changes/batches will be completed prior to issuing the first notice.

Manual Notices

A report will be prepared and sent to W-2 agencies for all open cases that have had a review between January 1, 1999 and the date in which the appropriate CARES programming is complete. An agency report will be provided identifying these cases. Because CARES will not issue a notice for these cases, W-2 workers must send a manual notice to the W-2 participants in the cases identified on the report. (See attached manual notices provided in English, Bosnian/Croatian/Serbian, Vietnamese, Spanish and Hmong languages).

DATA CLEANUP

Prior to issuing the first clock notices, a series of batch runs are being scheduled in order to tick those clocks that would have ticked based on the policies described above.

More specifically, batch runs have been created to:

1. Clean up data related to ticking OPC clocks.

W-2 clock cycles will be re-run to correctly tick OPC clocks that would have been ticked since this policy was implemented in mid-October. CARES will go back to November 1, 1997 and tick appropriate clocks.

2. Clean-up data related to ticking CMC clocks.

W-2 clock cycles will be re-run to correctly tick CMC clocks that would have been ticked since W-2 was implemented. CARES will go back to September 1, 1997 and tick appropriate clocks.

WARNING: Some individuals have been inappropriately placed in the CMC placement. More specifically, there are 3 situations in which the clock may tick inappropriately during the batch runs.

Scenario #1: Individuals placed in CMC prior to having a child less than 12 weeks of age.

Scenario #2: Individuals placed in CMC with never having a child less than 12 weeks of age.

Scenario #3: Individuals kept in the CMC placement after the child turned 12 weeks of age.

Individuals meeting one of these 3 scenarios will have their clocks ticked during these batch runs. In April, 1999, a report will be sent to each agency that will identify the cases fitting the scenarios described above. If, at that time, inappropriate placements are identified and a CMC payment(s) was issued during the time period covering the inappropriate placement, the payment(s) must be recouped. Once the payment is recouped, the tick for that eligibility month must be removed.

3. Correctly tick clocks which have failed to tick appropriately (see "Clocks Failing to Tick" below).

ADDITIONAL CARES INFORMATION RELATED TO CLOCKS

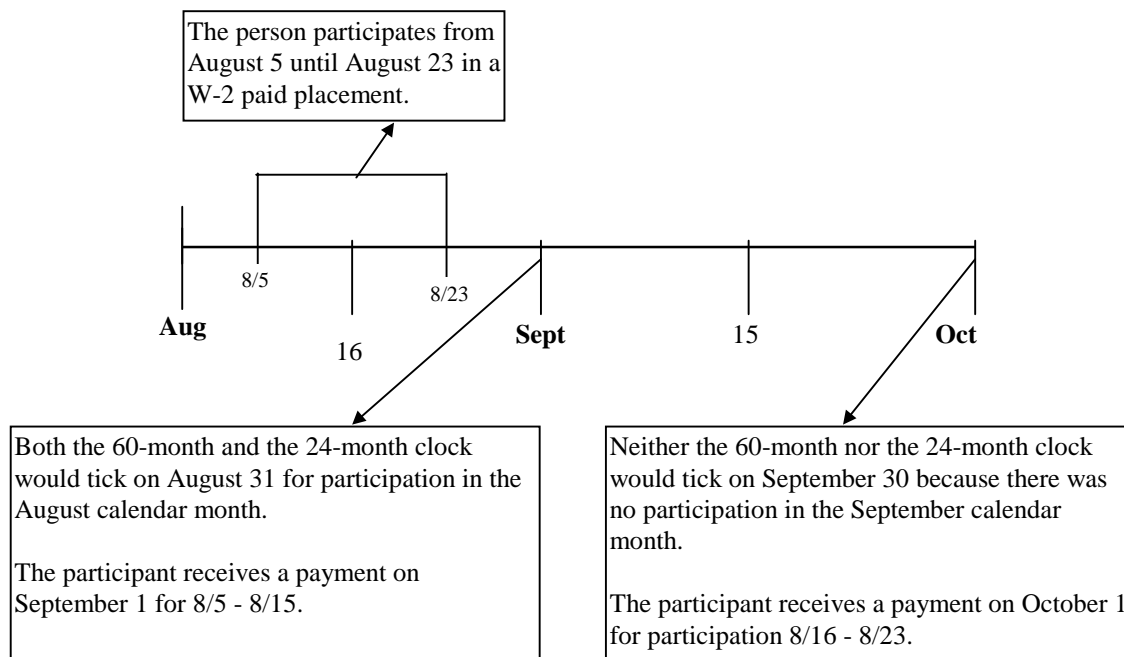
When A Clock Ticks

Questions have been raised regarding when CARES actually ticks a clock. The 24-month and 60-month clocks tick on the last day of the calendar month based on participation in that month.

If an individual participates in a W-2 employment position at any time during a month, that month counts towards both the 24-month time limit and 60-month lifetime limit. When a participant moves between employment positions during a calendar month, the 24-month clock will tick for the new employment position.

If the new W-2 placement is not in a W-2 employment position, the clock will still tick if the individual participated at any time during the month in a W-2 employment position subject to the 24-month clock.

Example:



Clocks Failing to Tick

Since March, 1998, workers have reported instances in which clocks failed to tick. Under most circumstances, the clock failed to tick because a worker did not confirm a change made on ACWI. As of February 13, 1999, CARES now identifies those cases that have had changes made to ACWI when the worker did not run SFED. CARES will now run SFED for these cases. This change, while not made specifically for clocks, should prevent this problem from occurring effective with the February W-2 clock cycle. Those cases in which the clock failed to tick will be included in the clean up process described in the "DATA CLEAN-UP" portion of this memo. The data clean up process, which will be completed over several weeks in March, will be finalized prior to the implementation of the notice changes to ensure a correct display of the W-2 time limit information on the notice.

EDUCATIONAL TELECOMMUNICATIONS NETWORK (ETN)

An ETN was held on Monday, February 22, 1999, to provide an overview of W-2 time limits and extensions. Following are questions and answers from the ETN.

Q1. How should workers record the number of months a person received TANF assistance in another state?

A1. If the individual is known to CARES (W-2, FS, MA or CC open assistance group): On screen AIWO (Clock Override Screen), the worker can increment the 60-month clock using the JOBS clock with the override reason "Benefits From Other State" (AAB).

Q2. Previously, workers were able to manually increment all clocks. CARES now prevents workers from incrementing the 24-month employment position clocks and only allows deleting ticks on the clock. How can workers increment the 24-month W-2 employment position clocks to reflect the issuance of an auxiliary or supplemental benefit?

A2. Due to the lifetime impact that occurs as a result of incrementing the clock, CARES has been modified and no longer allows workers to manually tick the 24-month employment position clocks to prevent potential worker errors. To increment the 24-month employment position clock, contact the Call Center for assistance.

NOTE: Clocks are not incremented based on issued payments, they are incremented based on calendar months in which there was participation in the AG in a W-2 employment position which is subject to a clock. Therefore, before manually incrementing a clock, a worker must first check to make sure that the appropriate clock has not already ticked (see When a Clock Ticks).

Q3. When will the CARES Guide be updated to reflect the new W-2 CARES functionality (including screen prints)?

A3. The CARES Guide is currently being updated. Individual sections will be released as they are completed.

Q4. Can a W-2 participant request a Fact Finding if the 24 or 60 month extension is denied on the agency level or on the Department level?

A4. If a W-2 24 or 60 month extension is denied, W-2 participants may first request a Fact Finding Review and the W-2 agency must re-submit an updated W-2 Extension Request, along with any additional documentation to their W-2 Contract Manager. The extension request will again be reviewed based on the new information. A new decision will be issued based on the new review. If the participant is still not satisfied with the result, a Departmental Review may be requested.

Q5. If a W-2 24 or 60 month extension is denied, will CARES issue a notice?

A5. W-2 extension notices will soon be implemented. In the interim, W-2 agencies should issue manual denial notices to W-2 participants who have not been approved for an extension. A model notice will be provided to agencies as soon as possible.

CONTACTS

For policy or CARES questions related to W-2 Time Limits, please contact the Call Center at 608-261-6317.

NOTICE

Agency Name
Street Address
City, State, Zip Code

AEE
NOTICE OF DECISION
State of Wisconsin
Department Workforce Development

QUESTIONS? Ask your worker.

Date: March 1, 1999
Case Name: JANE DOE
Case Number: 1234567890
Worker Name: JANE WORKER
Worker No: XBC123
Telephone: (123) 111-7899

JANE DOE
123 MAIN STREET
BADGER CITY, WI 12345

W-2 Worker Name: JANE FEP
Worker No: XBC456
Telephone: (123) 111-1234

Wisconsin Works (W-2)

Your eligibility for W-2 has been reviewed.

W-2 is a time-limited program and is subject to a lifetime limit of 60 months, but placement cannot exceed 24 months in each W-2 employment and training category (Trial Jobs, Community Service Jobs, and W-2 Transitions). W-2 placement is determined by your W-2 worker based on your job history, education, abilities and family situation.

JANE DOE

Placement/Clock Type	Months Used
Community Service Job	6
W-2 Transitions	3
Trial Job	1
AFDC Job Opportunity Basic Skills Program	7
Total Months Used	17

If you have any questions regarding your time limits contact your W-2 worker.

W-2 extensions may be requested for exceptional circumstances. Examples include a person who is unable to work due to a disability, is needed to care full-time for a W-2 group member with a disability, or other unique circumstances. Refer to the Guide to Time Limits pamphlet for more information about W-2 time limits. Contact your W-2 worker if you have questions about W-2 services or other resources available to you.

LAWS: Wis. Stat. 49.145(2)(n) LAWS: Wis. Stat. 48.148(1m)(a) and (b)

OBAVJESTENJE:
Bosnian/Croatian/Serbian Language

AGENCY RETURN ADDRESS:

AEE
OBAVJESTENJE O ODLUCI
State of Wisconsin
Department Workforce Development

PITANJA? Pitajte Vaseg W-2 radnika.

Date/Datum:
Case Name/Ime slucaja:
Case Number/Broj slucaja:
Worker Name/Radnikovo ime:
Worker No/Radnikov broj:
Telephone/Telefon:

W-2 Worker Name/Ime W-2 radnika:
Worker No/Radnikov broj:
Telephone/Telefon:

Wisconsin Works (W-2)

Vasa kvalifikacija za W-2 je obradjena.

W-2 je program sa ukupnim vremenskim ogranicenjem na 60 mjeseci. Mogucnost uvazenja za bilo koju kategoriju programa kao sto su Trial Jobs, Community Service Jobs, W-2 Transitions ne smije precu 24 mjeseca pojedinačno za bilo koji program, bilo da je trening ili vid pomocnog zaposlenja. Vas W-2 radnik ce odluciti na osnovu Vase radne istorije, obrazovanja, mogucnosti, porodicne situacije za koju vrstu programa cete biti odredjeni.

PARTICIPANT NAME

Odrediste/Vrsta vremenskog ogranicenja Broj mjeseci

Community Service Job
W-2 Transitions
Trial Job
AFDC Job Opportunity Basic Skills Program
Ukupni broj mjeseci

Molimo Vas da kontaktirate Vaseg W-2 radnika ako imate pitanja vezana za vremenska ogranicenja.

Produzetak W-2 moze biti zatrazen u slucaju neuobicajene situacije. Npr. osoba koja nije u mogucnosti da fizicki obavlja posao, ili ima zdravstveni problem druge vrste, osoba koja vodi brigu o srodniku ili osobi sa fizickim nedostatkom ili zdravstvenim problemom druge vrste. Molimo Vas da procitate uputstva u W-2 knjizici o vremenskim ogranicenjima (Guide to Time Limits). Kontaktirajte Vaseg radnika ako imate pitanja o uslugama W-2 ili o drugim izvorima koje mozete koristiti.

ZAKONI: Wis. Stat.49.145(2)(n) ZAKONI: Wis. Stat.48.148(1m)(a) and (b)

W-2 Fact Finding: Ako se ne slazete sa W-2 odlukom, mozete traziti da se Vas slucaj ponovo obradi od strane Vase agencije. Da bi ste dobili Fact Finding Review, obratite se pismenim putem Vasem radniku ili W-2 agenciji u roku od 45 dana od vremena stupanja na snagu odluke od strane Vase agencije.

Narocite potrebe: Da bi ucestvovali u programu a fizicki ste nesposobni ili imate zdravstveni problem odredjene vrste ili potrebu bilo koje vrste, mozete traziti pomoc kontaktirajuci W-2 radnika imenovanog na vrhu ovog pisma.

NOTIFICACION

Nombre de la Agencia
Dirección
Ciudad, Estado, Código Postal

AEE
NOTIFICACION DE DECISION
Estado de Wisconsin
Departamento de Desarrollo Laboral

PREGUNTAS? Pregúntele a su trabajador.

Fecha: 1 de Marzo de 1999
Nombre del Caso: JANE DOE
Número del Caso: 1234567890
Nombre del Trabajador: JANE WORKER
Número del Trabajador: XBC123
Teléfono: (123) 111-7899

JANE DOE
123 MAIN STREET
BADGER CITY, WI 12345

Nombre del Trabajador de W-2: Jane FEP
Número del Trabajador: XBC456
Telefono: (123) 111-1234

Wisconsin Works (W2)

Se ha revisado su elegibilidad para el programa de W-2.

W-2 es un programa de tiempo limitado y está sujeto a un límite de 60 meses en la vida de cada participante. Además, el participante no puede ser colocado por más de 24 meses en cada categoría de empleo y entrenamiento de W-2 (Trabajos a Prueba (Trial Jobs), Trabajos de Servicio de Comunidad (Community Service Jobs), y Transiciones del W-2 (W-2 Transitions). Su trabajador de W-2 determina su colocación basándose en su historia de trabajo, educación, habilidades, y situación de su familia.

JANE DOE

Colocación/Tipo de Reloj	Meses Usados
Trabajo de Servicio de Comunidad	6
Transiciones del W-2	3
Trabajos a prueba	1
Programa de Abilidades Básicas de Oportunidad de Trabajo del AFDC	7
Total de Meses Usados	17

Si usted tiene alguna pregunta acerca de sus límites de tiempo póngase en contacto con su trabajador de W-2.

En circunstancias excepcionales, se puede solicitar una extensión de W-2. Por ejemplo, una persona que no puede trabajar debido a su propia incapacidad, o que se ve requerida a cuidar constantemente a un miembro incapacitado del grupo de W-2, u otras circunstancias únicas. Refiérase a la publicación Guía de Límites de Tiempo para mayor información acerca de los límites de tiempo del W-2. Llame a su trabajador de W-2 si tiene preguntas acerca de los servicios de W-2 u otros recursos disponibles.

LEYES: Wis. Stat. 49.145(2)(N)

LEYES: Wis. Stat. 48.148(1m)(a) and (b)

REVISO DE DATOS W-2: Si usted no está de acuerdo con la decisión de W-2, usted puede pedirle a la agencia que revise su caso. Para pedir un reviso de los datos, escríbale a su trabajador o a la agencia de W-2 dentro de los 45 días de la fecha efectiva de la agencia.

NECESIDADES ESPECIALES: Si está incapacitado o tiene otra necesidad, puede pedir ayuda para participar en el programa si llama al trabajador identificado arriba.

**CEEBOOM
(Hmong)**

Agency Return Address:

AEE
CEEM TOOM TXOG KEV TXIAV TXIM
State of Wisconsin
Department of Workforce Development
MUAJ LUS NUG ?
Nug tau tus neeg ua hauj lwm rau koj hauv W-2

Hnub Tim (Date):
Npe (Case Name):
Tus Ua Hauj Lwm (Worker Name):
Worker No.:
Xov Tooj (Telephone):

W-2 Tus Neeg Ua Hauj Lwm (W-2 Worker Name):
Worker No.:
Xov Tooj (Telephone):

Wisconsin Ua Hauj Lwm (Wisconsin Works, W-2)

Koj qhov tsim nyog tau txais W-2 kev pab cuam tau raug rov qab muab los soj ntsuam dua.

W-2 yog kev pab cuam muaj caij nyoog thiab nws raug txwv kom tsuas muaj txog 60 lub hlis xwb hauv koj lub neej, tab sis nyob rau hauv ib qho kev ua hauj lwm thiab kev kawm twg (xws li Trial Jobs, Community Service Jobs, thiab W-2 Transitions) nws tsis pub kom dhau 24 lub hlis. Qhov yuav muab koj tso rau qhov twg yog tus neeg ua hauj lwm rau koj hauv W-2 (W-2 case worker) yog tus txiav txim raws li koj kev ua hauj lwm yav dhau los, kev kawm, kev muaj peev xwm thiab kev nyob noj ntawm koj tsev neeg.

Participant Name

Months Used

Placement/Clock Type
Community Service Job
W-2 Transitions
Trial Job
AFDC Job Opportunity Basic Skills Program

Total Months Used

Yog koj muaj lus nug txog koj cov caij nyoog hauv kev pab cuam ntsib tau tus neeg ua hauj lwm hauv W-2.

Ncua cov caij nyoog W-2 kev pab cuam (W-2 extensions) yuav thov tau rau tej yam teeb meem loj. Piv txwv li ib tus neeg uas nws ua tsis tau hauj lwm vim kev muaj mob, vim yuav tau nyob hauv tsev pab ib tus neeg zwm rau W-2 uas muaj mob, los yog lwm yam teeb meem loj. Xyuas hauv phau me nyuam ntawv hais txog W-2 cov caij nyoog kom paub ntau ntiv txog qhov no. Ntsib tau tus neeg ua hauj lwm yog koj muaj lus nug txog kev pab cuam ntawm W-2 los yog lwm yam kev pab uas muaj rau koj.

LAWS: Wis. Stat. 49.145(2)(n) LAWS: Wis. Stat. 48.148(1m)(a) and (b)

W-2 Kev Nrhiav Qhov Tseeb: Yog koj tsis pom zoo raws li qhov W-2 tau txiav txim, koj muaj peev xwm thov kom lub chaw ua hauj lwm rov qab ntsuam xyuas koj cov teeb meem dua. Yuav kom muaj qhov kev ntsuam xyuas no, sau ntawv rau lub chaw ua hauj lwm W-2 tsis pub dhau 45 hnub tom qab lub chaw ua hauj lwm tau txiav txim rau koj.

Kev Xav Tau Kev Pab: Yog koj muaj mob los yog xav kom pab koj lwm yam, koj yuav nug tau tus neeg ua hauj lwm uas nws lub npe tau muab teev cia saum no.